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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \*

MARIA CHAIDEZ DE HERRERA,  
individually,

Plaintiff,

vs.

OTIS ELEVATOR COMPANY, a foreign  
corporation; TK ELEVATOR CORPORATION,  
a domestic corporation; TK ELEVATOR  
CORPORATION, a foreign corporation; TK  
ELEVATOR MANUFACTURING, INC., a  
foreign corporation; DOES 1 through 30,  
inclusive; and ROE BUSINESS ENTITIES 4  
through 30, inclusive,  
Defendants.

CASE NO.: 2:24-cv-01122-GMN-BNW

**STIPULATION AND ORDER TO**  
**EXTEND PLAINTIFF'S OPPOSITION**  
**DEADLINE ON DEFENDANT OTIS**  
**ELEVATOR COMPANY'S MOTION**  
**FOR SUMMARY JUDGMENT**

The Hon. Gloria M. Navarro

Trial Date: None Set

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, MARIA CHAIDEZ DE HERRERA through her counsel of record, BERTOLDO CARTER SMITH & CULLEN, and Defendants OTIS ELEVATOR COMPANY, through their counsel of record, the law firm of ROGERS MASTRANGELO CARVALHO & MITCHELL, that the deadline for Plaintiff to oppose Defendant Otis Elevator Company's Motion for Summary Judgment be continued. No Trial date has been scheduled. The parties do not seek a trial continuance. This is the parties first request for an extension of time. Defendant Otis Elevator Company filed its Motion for Summary Judgment on April 1, 2025. The current deadline for Plaintiff's Opposition is April 15, 2025.

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The parties agree to extend the deadline for Plaintiff's Opposition to April 25, 2025.

The parties further agree to extend the deadline for Defendants' Reply to May 9, 2025.

DATED this 10<sup>th</sup> day of April, 2025

DATED this 10<sup>th</sup> day of April, 2025

**BERTOLDO CARTER  
SMITH & CULLEN**

**ROGERS MASTRANGELO  
CARVALHO & MITCHELL**

/s/ Paul R.M. Cullen, Esq.

/s/ Rebecca L. Mastrangelo, Esq.

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DATED this 10<sup>th</sup> day of April, 2025.

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**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: April 11, 2025

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, pursuant to F.R.C.P.5(B)(2)(1), a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S OPPOSITION DEADLINE ON DEFENDANT OTIS ELEVATOR COMPANY'S MOTION FOR SUMMARY JUDGMENT** has been served upon the following counsel through CM/ECF electronic service, on this the 10<sup>th</sup> day of April, 2025.

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/s/ Rachel Douglas  
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